

## REMARKS

Claims 1-45 are pending in this application. Claims 1 and 30 have been amended. In the Office Action of April 26, 2005, the Examiner rejected claims 1-45. Applicant respectfully requests entry of the amendment and reconsideration of the pending claims.

### Rejection under 35 USC §103

In the Office Action, the Examiner rejected claims 1-45 under 35 U.S.C. 103(a) as being unpatentable over Microsoft Front Page Screen Capture (hereafter, "Front Page") in view of US Patent 6,092,068 (Dinkelaker). The Applicant respectfully traverses these rejections.

The Office Action has not established that either the Front Page reference or the Dinkelaker patent is prior art. The instant application claims the benefit of the filing date of U.S. Patent No. 6,259,445 which was filed on July 7, 1997. The Office Action cites a Microsoft Copyright of 1995-1999 and has not established that any of the features of Front Page cited in support of the rejections predate the effective filing date of the instant application. Consider for example that a copyright notice showing a 1999 date could mean that the very features relied upon could have all been added in 1998 or 1999. Dinkelaker was filed on August 5, 1997 and the instant application has an effective filing date of July 7, 1997. Therefore, Dinkelaker is not prior art to the claimed subject matter.

The cited combination of references does not teach or suggest the elements of claim 1. Front Page provides help for a markup language it does not assist a programmer by showing example annotations relating to how to write functional code as the claimed invention does. The claims of the instant application relate to techniques of formatting existing examples to convert keywords within the programming language examples into live look ups of detailed explanations for those keywords of the programming language. The instant patent application is not claiming the generic link and index mechanisms of a help system as shown in Front page.

FrontPage is a document editor. FrontPage doesn't run example applications and thus cannot demonstrate user interaction while showing the annotated source code that implemented the example application. The instant patent application isn't claiming user interaction *per se*, which is a generic method of computer programs, but interaction as part of the live

demonstration of the runtime behavior of source code for an example application. The formatted paragraphs with tip and note labels within a FrontPage help page are not annotations of source code within an example program. The FrontPage help page explains how to style documents using the preexisting capabilities of the FrontPage editor. The help page doesn't explain the techniques for writing source code for computer applications, techniques that can be used in any editor tool. The mere act of opening a new web page in another window is not the same as opening the annotation for a running web application. The instant patent application is not generically claiming opening web pages in new windows.

The cited combination of references does not teach or suggest the claimed element of presenting an annotation page. Figures 4-6 of the Front Page reference do not teach or suggest any annotation "descriptive of a source code file" as claimed. Consider that in figure 4, the right column is not an "annotation" as claimed because it does not relate to a source code file. Instead, it is list of instructions on how to save a frames page template. It also fails to teach or suggest explanation of **code** used in the application. Again, the right column explains how to use functions in the user interface, not code.

The cited combination of references does not teach or suggest the steps of: if the user selects a keyword link, presenting reference documentation associated with that keyword; and if the user selects an annotation link, presenting another annotation descriptive of another source code file of a predetermined application. The Office action cites figures 4 and 6 of Front Page as disclosing: "if the user selects a keyword link, presenting reference documentation associated with that keyword." However, neither figure 4 nor figure 6 show this claim step. In figure 4 the middle column does not show "keyword links" as claimed. The claimed keyword links are comprised by the annotation. By contrast the elements of the screen shot of figure 4 alleged to be keyword links are part of an index of topics, not a keyword list as claimed. Similarly, figure 6 only shows underlined text in the right column. It is not clear that this text is an annotation link that if selected will present another annotation descriptive of another source code file and the Office Action has not shown that this occurs. The Office Action cites figure 6 as disclosing the claimed step of " if the user selects an annotation link, presenting another annotation descriptive of another source code file of a predetermined application." Claims 1-28 are dependent on claim

1 and are patentable over the cited references at least for the reasons discussed above.

On claim 29, the Office Action contends that it is individually similar in scope to claim 1 and is rejected "under similar rationale." Applicant respectfully traverses this rejection. First, Applicant traverses the conclusion that the claim is similar in scope to claim 1 because the claim language is different. Second, it is inappropriate to reject under a "similar" rationale because it forces Applicant to speculate on what is a similar rationale.

On claim 30, the Office Action cites figs. 4-6 of Front Page for the first claim step. However, the Office Action has not shown how anything in any of the cited figures is a **global** table of contents or how such a table would based on the content in the environment. The Office Action cites figure 7 for the second claim step. However, figure 7 does not show anything that is a local table as claimed. As amended claim 30 requires a local table that provides a structured hierarchical view at a local corner of an unstructured web page of links. The center column shows html text, the center column shows a keyword entry box, a set keyword choices, and a set of topics. The right column shows an explanation of right-to-left features. Nothing in those columns teaches or suggests a local table as claimed or that orients a user within a local topic at all.

As to claim 31, the Office Action cites figures 8-10 for the first step of claim 31. Front Page does not provide a plurality of predefined interactive examples. FrontPage happens to display markup language tags (figure 10) but these tags relate to how the text is displayed, they are not examples at all.

As to claim 32, Applicant agrees that the claimed subject matter is substantially an apparatus counterpart of claim 1 and hence asserts the same reasons for allowance as set forth with respect to claim 1. Claims 33-44 are dependent on claim 32 and are also patentable for at least the same reasons for allowance as set forth with respect to claim 1.

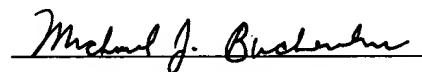
As to claim 45, the Office action cites Front Page figs. 5-10 for the claimed web-browser window. However figures 5-10 do not show a web-browser that includes a content frame, a framework applet, and a table of contents frame that displays a global table of contents hierarchy of links related to content in the content frame. Likewise, Front Page does not show one or more annotations displayed in the content frame. The Office Action has not shown that Front Page

discloses a content frame as claimed. As established above, the help instructions of Front Page are not annotations as claimed. In the FrontPage screen shots, the help is not providing an annotation of a working example. The help instead provides explanations for how to use the functions of the tool. FrontPage can display the formatted document without style, but the document is not a vehicle for programming applications, so there is nothing to annotate in the document.

Dinkelacker relates to electronic documents ( a review tool) and does not teach or suggest modifying the FrontPage reference to make up for the subject matter admittedly missing from FrontPage. There is no executable instruction in Dinkelacker; it merely provides help for HTML tags. Moreover, there is no teaching, suggestion, or motivation in either reference to combine the references as done in the Office Action. The rationale used in the Office Action was that it would have been obvious "to prevent the confusion of the user/developer during the coding process to distinguish and minimize the choice(s) from the vast information/instruction about a particular code/task..." and only discussion cited by the Office Action was at col. 5, lines 40-44. However, that discussion has nothing to do with the rationale given.

Applicant respectfully requests reconsideration of the rejections in view of the foregoing amendments and remarks.

Respectfully submitted,



Michael J. Buchenhorner

Reg. No. 33,162

Date: Nov. 2, 2005

HOLLAND & KNIGHT LLP

Holland & Knight LLP

701 Brickell Avenue, Suite 3000

Miami, FL 33131

(305) 789-7773 (voice)

(305) 789-7799 (fax)

**Certificate of First Class Mailing**



I hereby certify that this Amendment and Response to Office Action, and any documents referred to as attached therein are being transmitted via United States First Class Mail on this date, November 2, 2005, to the Commissioner for Patents, U.S. Patent and Trademark Office, P.O. Box 1450, Alexandria, VA 22313-1450.

Michael J. Buchenhorner

Michael J. Buchenhorner

Date: November 2, 2005

# 3348648\_v1